



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

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June 9, 2025

ECF

Honorable Claire C. Cecchi
United States District Judge
Martin Luther King Jr. U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *M.S.M. v. Pittman, et al.*, Civil No. 25-3982 (CCC)

Dear Judge Cecchi:

This Office represents the Respondents in the above habeas matter where Petitioner also seeks an injunction ordering his immediate release from immigration detention or a second custody redetermination hearing. I write on behalf of the Respondents to respectfully request leave of Court to file a 54-page omnibus response to Petitioner's habeas petition and opposition to his request for preliminary injunction/ temporary restraining order. Adam R. Mandelsburg, Esq., counsel for Petitioner, consents to the 54-page omnibus response.

As the Court is aware, the Court authorized the Respondents to file a 50-page brief supporting an omnibus motion to dismiss the habeas petition and requests for injunctive relief as well as a 20-page reply in further support of the motion. Respondents, however, decided to file a single response to the petition and an opposition to the requests for injunctive relief rather than file a separate motion. Accordingly, Respondents will only file one omnibus brief supporting their request for dismissal of the habeas action and denial of Petitioner's requests for injunctive relief. This means that Respondents will file only a 54-page brief and not a 50-page moving brief and 20-page reply in response to both the habeas petition and requests for injunctive relief.

I thank the Court for its consideration of this request.

Respectfully submitted,

ALINA HABBA
United States Attorney

By: s/*Frances C. Bajada*
FRANCES C. BAJADA
Assistant United States Attorney

cc: Counsel of record (ECF)

SO ORDERED

s/Claire C. Cecchi
CLAIRE C. CECCHI, U.S.D.J.

Date: 6/12/2025